

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Rondi Sueann Boudreau,
f/k/a Rondi Sueann Nickolauson,

Court File No. _____

Plaintiffs,

**NOTICE OF REMOVAL
OF ACTION**

v.

Ally Financial, Inc.,

Defendant.

TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
MINNESOTA:

Defendant Ally Financial, Inc. (“Ally”) removes the above-titled action from the District Court for the County of Dakota, State of Minnesota, to the United States District Court for the District of Minnesota and alleges as follows:

1. This Court has original jurisdiction over this action because Plaintiffs bring claims and seek damages and relief under the Telephone Consumer Protection Act (“TCPA”) 47 U.S.C. § 227, *et seq.* Therefore, this action is one in which the United States District Court for the District of Minnesota has original federal jurisdiction under 28 U.S.C. §1331, and this action may be removed to this Court by Ally pursuant to 28 U.S.C. §1441(a).

2. Ally received a copy of the Summons and Complaint (attached hereto as **Exhibit A**) on or after June 21, 2012.

3. Ally served a copy of its Answer (attached hereto as **Exhibit B**) on July 18, 2012.

WHEREFORE, Defendant removes this action from Dakota County District Court, State of Minnesota, to the United States District Court for the District of Minnesota

MESSERLI & KRAMER, P.A.

Dated: July 19, 2012

s/ Joshua A. Hasko

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ATTORNEYS FOR DEFENDANT ALLY
FINANCIAL, INC.

VERIFICATION

I, Joshua A. Hasko, declare as follows:

I am the attorney for Ally Financial, Inc., and have read the foregoing Notice of Removal of Civil Action to United States District Court and know the contents thereof. I am informed and believe that the matters stated therein are true and on that ground allege that the matters stated therein are true.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 19th day of July, 2012, at Minneapolis, Minnesota.

s/ Joshua A. Hasko
Joshua A. Hasko

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